



U.S. Department of Justice

United States Attorney
Eastern District of Missouri

Criminal Division

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December 5, 2019

Deborah J. Westling
Law Office of Gerhard J. Petzall, LLC
16216 Baxter Road, Suite 350
Chesterfield, Missouri 63017

RE: United States v. Shamekia Jackson
Cause Number: S1- 4:19CR0740 (RWS/JMB)

Dear Counsel:

As you are aware, your client was indicted by the Federal Grand Jury. In order to assist you in the determination of any relevant pre-trial motions to be filed in this case, please be aware of the following information:

1. DISCOVERY –With this correspondence, I am providing to you the following discovery. If you find any of the below-described discovery missing from this packet, please let me know as soon as possible. The discovery includes the following:

- a. SLMPD Incident Report, CN 19-039388 (No. 1-86);
- b. SLMPD Incident Report, CN 19-039284 (No. 87-196);
- c. Firearms/Ballistics Photographs (No. 197-208);
- d. Search Warrant Photos from East Prairie Residence (No. 209-271);
- e. Consent Forms (No. 272-284);
- f. Documents from Garda regarding monetary loss (No. 285-306);
- g. Drug Lab (No. 307-308);
- h. Photographs of Armored Vehicle (No. 309-329);

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- i. Photographs taken at Central Patrol (No. 330-346);
- j. Photographs taken at Sheraton (No. 347-358);
- k. Search Warrant Documents (No. 359-390);
- l. Car Registration (No. 391); and
- m. BMW Tow Documents (No. 392-393).

In addition, I am including a disk containing your client's statement to law enforcement. I am also including a thumb drive containing a significant amount of surveillance video retrieved from local commercial establishments.

- 2. ELECTRONIC SURVEILLANCE - The Government did not utilize audio or video surveillance in the investigation underlying the charges set forth in the indictment.
- 3. CONFIDENTIAL INFORMANTS - The Government did not utilize a confidential informant in the course of the investigation of this matter.
- 4. JENCKS MATERIAL - The Government will make all JENCKS material available, to the extent any exists, no later than the Friday preceding trial, conditioned upon the defendant's agreement to make available statements of defendant's witnesses at the same time.
- 5. GRAND JURY TRANSCRIPTS - The Government agrees to produce all Grand Jury transcripts to the extent they constitute JENCKS material and make them available for inspection.
- 6. OTHER CRIMES EVIDENCE - The Government agrees to advise the defendant of its intention to use evidence of other crimes during its case-in-chief. The government agrees to make this disclosure prior to the trial of this cause.
- 7. STATEMENTS OF DEFENDANT - The Government does possess verbal statements of the defendant and intends to use them at trial. A disk containing those statements has provided.
- 8. IDENTIFICATION OF DEFENDANT - The Government is unaware of a post-arrest identification of the defendant.
- 9. PHYSICAL EVIDENCE - The Government does possess items of physical evidence seized from the defendant. Please let me know when you would like to review those items.
- 10. FAVORABLE EVIDENCE - The Government agrees to furnish any and all favorable evidence to the defendant if and when its existence becomes known to the Government. At the present time, the Government does not have favorable evidence.

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If you need any further specific information regarding the above matters, or any other matters which will prevent the filing and litigation of any unnecessary pretrial motions, please do not hesitate to call me.

In order to avoid the need of filing motions pursuant to Rules 16 and 26, the Government makes the following requests;

Pursuant to Rule 16(b)(1)(A), (B) and (C), Federal Rules of Criminal Procedure, the United States hereby requests that:

A. The defendant provide the United States, or permit the United States to inspect and copy or photograph books, papers, documents, photographs, tangible objects, or copies thereof, which are within the possession, custody or control of the defendant and which the defendant intends to introduce as evidence in chief at trial.

B. The defendant provide the United States, or permit the United States to inspect and copy or photograph any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to his testimony.

C. The defendant provide the United States a written summary of the testimony that the defendant intends to use under Rules 702, 703, or 705, Federal Rules of Evidence, as evidence in trial, which includes a description of the witnesses' opinions, the bases and reasons for those opinions, and the witnesses' qualifications.

Further, pursuant to the provisions of Rule 26.2 the Government requests the defendant and his attorney to provide to the Government any statements of defense witnesses that are in their possession and that relate to the subject matter concerning which the witnesses have testified.

Pursuant to Rule 12.1, the Government requests that the defendant notify the government of any intended alibi defense; specifically, that the defendant was not present at the time, date and place of the offenses listed in the indictment.

The Government requests a response prior to the hearing date on the motions to establish whether it needs to file its request for a court order to enforce compliance.

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I thank you in advance for your anticipated cooperation.

Very truly yours,

JEFFREY B. JENSEN
United States Attorney

A handwritten signature in cursive script, reading "Allison H. Behrens", underlined.

ALLISON H. BEHRENS
Assistant United States Attorney

cc: Court File